

REMARKS

Favorable reconsideration of this Application as presented herein is requested. Upon entry of this Reply, claims 1-21 and 23-26 are pending in this Application. Based on the following remarks, Applicants respectfully request the Examiner to reconsider and withdraw all outstanding objections and rejections.

Claim Rejections under 35 U.S.C. § 103

In the Office Action, the Examiner rejects claims 1-21, 23, 25 and 26 under 35 U.S.C. § 103(a) as allegedly being unpatentable over U.S. Patent No. 6,185,613 to Lawson *et al.* (“Lawson”) in view of U.S. Patent No. 5,903,893 to Kleewein *et al.* (“Kleewein”). (Paper No. 04102006, page 3). Applicants respectfully traverse this rejection.

Lawson and Kleewein, taken alone or in combination, do not teach or suggest each and every feature and/or limitation of the above claims. For example, referring to independent claim 1, Lawson and/or Kleewein do not teach or suggest:

distributing the event database to a plurality of remote network locations, wherein each remote network location stores a local table containing event data generated at the remote location and one or more replica tables containing event data generated at other remote locations, and wherein a union of the local and replica tables is generated to form a combined event database at the remote location.

In the Office Action, the Examiner has cited Lawson as the primary document to allegedly disclose this feature. However, it should be understood that Lawson does not teach or suggest an “event database” that stores “event data” gathered from a “plurality of monitoring devices,” as recited in claim 1. It follows therefore that Lawson cannot teach or suggest the distributing or updating of event data to a “local table” at one location or to a “replica table” at a second location. On the contrary, Lawson discusses an event “notification” system and method that send notifications to specified customers when an event occurs. (*See* Lawson, Abstract). Lawson discusses that a local event registry and a global event registry are queried by a server to determine which customers to notify when an event occurs. (Lawson at Column 8, lines 14-44). Each event registry therefore contains a list of servers associated with each customer, and each registry includes a list of events that initiates the notification service. (*Id.*). The “list of events”

should not be confused with actual “event data.” Lawson does not teach or suggest that its registries can store the actual “event data generated at [any] location,” as recited in claim 1. The registries discussed by Lawson merely are accessed to decide which local or remote server will receive a notification depending on whether a local registry or a global registry, respectively, is consulted. Therefore, Lawson’s local registries identify local servers that are registered to receive a notification, and do not contain “event data generated at the [local] location.” Furthermore, Lawson’s global registries identify non-local servers that are registered to receive a notification, and do not contain “event data generated at [non-local] locations.”

Kleewein fails to cure the deficiencies of Lawson because Kleewein also does not teach or suggest “distributing the event database to a plurality of remote network locations, wherein each remote network location stores a local table containing event data generated at the remote location and one or more replica tables containing event data generated at other remote locations, and wherein a union of the local and replica tables is generated to form a combined event database at the remote location.” The Examiner has cited Kleewein to allegedly disclose the “union of a local and remote table to form a combined database,” which Applicants do not concede. However, Kleewein, like Lawson, does not teach or suggest an “event database” that stores “event data” gathered from a “plurality of monitoring devices,” as recited in claim 1. Therefore, Lawson and Kleewein, taken alone or in combination, do not teach or suggest claim 1.

Independent claims 3, 4, 25, and 26 recite features comparable to independent claim 1 (as well as additionally recited features), and therefore are patentable over Lawson and/or Kleewein for at least the reasons stated above. Moreover, claims 2, 5-21, 23, and 24 depend directly or indirectly from independent claims 1 or 4, and are therefore patentable over Lawson and/or Kleewein for at least the above reasons in addition to the features recited therein. Applicants respectfully request reconsideration and withdrawal of the standing rejections, and allowance of the pending claims.

In the Office Action, the Examiner also rejects claim 24 under 35 U.S.C § 103(a) as allegedly being unpatentable over Lawson in view of Kleewein and further in view of U.S. Patent No. 6,341,340 to Tsukerman *et al.* (“Tsukerman”). (Paper No. 04102006, page 14). Applicants respectfully traverse this rejection.

As stated above, claim 24 depends directly from claim 4, and is therefore patentable over Lawson and/or Kleewein for at least the above reasons in addition to the features recited therein. Tsukerman fails to cure the deficiencies of Lawson and Kleewein, because Tsukerman also does not teach or suggest “distributing the event database to a plurality of remote network locations, wherein each remote network location stores a local table containing event data generated at the remote location and one or more replica tables containing event data generated at other remote locations, and wherein a union of the local and replica tables is generated to form a combined event database at the remote location.” The Examiner has cited Tsukerman to allegedly disclose the “use of ownership in the case where a database may be shared between multiple locations,” which Applicants do not concede. However, Tsukerman, like Lawson and Kleewein, does not teach or suggest an “event database” that stores “event data” gathered from a “plurality of monitoring devices,” as recited in claim 4. Therefore, Lawson, Kleewein and Tsukerman, taken alone or in combination, do not teach or suggest claim 4 or claim 24. Applicants respectfully request reconsideration and withdrawal of the standing rejections, and allowance of the pending claims.

All of the stated grounds of objection and rejection have been properly traversed, accommodated, or rendered moot. Applicants therefore respectfully request that the Examiner reconsider all presently outstanding objections and rejections and that they be withdrawn. Applicants believe that a full and complete reply has been made to the outstanding Office Action and, as such, the present Application is in condition for allowance. If the Examiner believes, for any reason, that personal communication will expedite prosecution of this Application, the Examiner is kindly invited to telephone the undersigned at the number provided.

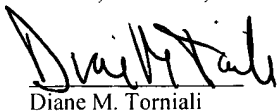
Prompt and favorable consideration of this Amendment and Reply is respectfully requested. The Commissioner is authorized to charge any deficiency or credit any overpayment to Deposit Account No. **02-4270**.

Date: June 30, 2006



Kendrick P. Patterson
Reg. No. 45,321

I hereby certify that the correspondence attached herewith is being transmitted by first class mail to Mail Stop: Amendment, Commissioner for Patents, Box 1450, Alexandria, VA 22313-1450:


Diane M. Torniali

6/30/06
Date

BROWN RAYSMAN MILLSTEIN FELDER
& STEINER LLP
900 Third Avenue
New York, New York 10022
Tel : (212) 895-2000
Fax: (212) 895-2900

Customer No. 29858

BRMFS1 925228v2